

Remarks

Reconsideration of this application as amended is respectfully requested.

Claims 1, 4-9 and 11 stand rejected under 35 U.S.C. §102(b) in view of Job Completion Based Inventory Systems: Optimal Policies for Repair Kits and Spare Machines (June 1985) by *Mamer et al.* ("*Mamer*").

Claims 10, 17, 19-23 and 25-27 stand rejected under 35 U.S.C. §103(a) in view of *Mamer*.

Claims 2, 3, 12-14, 16, 18 and 24 stand rejected under 35 U.S.C. §103(a) in view of *Mamer* and Service Management Principles and Practices (1994) by *Patton et al.* ("*Patton*").

Claim 15 stands rejected under 35 U.S.C. §103(a) in view of *Mamer* and *Patton* and U.S. Patent No: 5,682,421 of *Glovitz et al.* ("*Glovitz*").

Claims 1-27 are cancelled.

New claims 28-54 are added.

Applicant submits that new claim 28 is not anticipated by *Mamer* because *Mamer* does not disclose selecting a set of parts for an onsite repair of a product in response to a cost of mis-predicting each of a set of parts that may be replaced during the onsite repair as claimed in new claim 28. Instead, *Mamer* teaches selecting a set of parts for a repair kit in response to a yearly holding cost of parts (H) and a penalty cost of an incomplete job (L) and a frequency of part failure (F) and the expected number of repair jobs for the repair kit ( $\lambda$ ). (*Mamer*, equation 2.6 on page 706). It is submitted that a yearly holding cost of parts as disclosed by *Mamer* is not a cost of mis-predicting parts for an onsite repair as claimed in new claim 28. It is further submitted that a penalty cost of an incomplete job as disclosed by *Mamer* is not a cost of mis-predicting parts for an onsite repair as

claimed in new claim 28 because a cost of mis-predicting parts includes the cost of transporting parts that are not needed in a successful repair. (See page 5, second paragraph of applicant's specification).

Given that new claims 29-42 depend from new claim 28, it is submitted that that new claims 29-42 are not anticipated by *Mamer*.

Applicant also submits that new claims 43-54 are not anticipated by *Mamer* because *Mamer* does not disclose cost data that includes a set of costs associated with mis-predicting each of a set of parts that may be replaced during an onsite repair as claimed in new claims 43-54. Instead, *Mamer* discloses a yearly holding cost of parts (H) and a penalty cost of an incomplete job (L). (*Mamer*, page 704, second to last line through page 705, line 3). Furthermore, *Mamer* does not disclose a metric calculator that determines a waste metric for each part in response to a repair history and costs associated with mis-predicting as claimed in new claims 43-54. Instead, *Mamer* disclose a metric based on a yearly holding cost of parts (H) and a penalty cost of an incomplete job (L) and a frequency of part failure (F) and the expected number of repair jobs for the repair kit ( $\lambda$ ). (*Mamer*, equation 2.6).

It is also submitted that new claims 28-42 are not obvious in view of any combination of any of the references cited by the examiner because none of the references cited by the examiner teach or suggest selecting a set of parts for an onsite repair of a product in response to a cost of mis-predicting each of a set of parts that may be replaced during the onsite repair as claimed in new claims 28-42. Applicant has shown above that *Mamer* teaches selecting a set of parts for a repair kit in response to a yearly holding cost of parts (H) and a penalty cost of an incomplete job (L) and a frequency of

part failure (F) and the expected number of repair jobs for the repair kit (A) (*Mamer*, equation 2.6) and *Patton* teaches managing a parts inventory to minimize inventory costs (*Patton*, paragraph starting at bottom of page 163) rather than selecting a set of parts for an onsite repair of a product in response to a cost of mis-predicting each of a set of parts that may be replaced during the onsite repair as claimed in new claims 28-42. *Glovitz* teaches managing an inventory in response to repair records (*Glovitz*, col. 1, lines 53-61) but does not disclose or suggest selecting a set of parts for an onsite repair of a product in response to a cost of mis-predicting each of a set of parts that may be replaced during the onsite repair as claimed in new claims 28-42.

It is further submitted that new claims 43-54 are not obvious in view of any combination of any of the references cited by the examiner because none of the references cited by the examiner teach or suggest cost data that includes a set of costs associated with mis-predicting each of a set of parts that may be replaced during an onsite repair or a metric calculator that determines a waste metric for each part in response to a repair history and costs associated with mis-predicting as claimed in new claims 43-54. Instead, *Mamer* discloses a yearly holding cost of parts (H) and a penalty cost of an incomplete job (L) (*Mamer*, page 704, second to last line through page 705, line 3) and *Patton* teaches managing a parts inventory to minimize inventory costs (*Patton*, paragraph starting at bottom of page 163) and *Glovitz* teaches managing an inventory in response to repair records (*Glovitz*, col. 1, lines 53-61).

It is respectfully submitted that in view of the amendments and arguments set forth above, the applicable objections and rejections have been overcome.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 08-2025 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: 9-10-06 By: Paul, H  
Paul H. Horstmann  
Reg. No.: 36,167